



**FEDERAL ELECTION COMMISSION**

WASHINGTON, D.C. 20463

**April 18, 2000**

**Dr. Parvez Shah  
Pakistani Physicians Public Affairs Committee  
7350 Van Dusen Road, Suite 420-A  
Laurel, MD 20707**

**RE: MUR 4996  
Pakistani Physicians Public Affairs  
Committee  
Dr. Parvez Shah, as treasurer**

**Dear Dr. Shah:**

On April 4, 2000, the Federal Election Commission ("Commission") found that there is reason to believe Pakistani Physicians Public Affairs Committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 433(c), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Commission also found reason to believe that the Committee knowingly and willfully violated 2 U.S.C. § 434(a)(4)(A)(iii) and you, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii). The Factual and Legal Analysis, which formed a basis for the Commission's findings, is attached for your information.

You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath. In the absence of additional information, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

In order to expedite the resolution of this matter, the Commission has also decided to offer to enter into negotiations directed towards reaching a conciliation agreement in settlement of this matter prior to a finding of probable cause to believe. Enclosed is a conciliation agreement that the Commission has approved.

If you are interested in expediting the resolution of this matter by pursuing preprobable cause conciliation, and if you agree with the provisions of the enclosed agreement, please sign and return the agreement, along with the civil penalty, to the Commission. In light of the fact that conciliation negotiations, prior to a finding of probable cause to believe, are limited to a maximum of 30 days, you should respond to this notification as soon as possible.

Dr. Parvez Shah, Treasurer  
Pakistani Physicians Public Affairs Committee  
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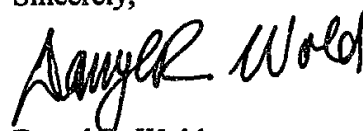
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Erica McMahon, the attorney assigned to this matter, at (202) 694-1650.

Sincerely,



Darryl R. Wold  
Chairman

Enclosures  
Factual and Legal Analysis  
Procedures  
Designation of Counsel Form  
Conciliation Agreement

## **FEDERAL ELECTION COMMISSION**

### **FACTUAL AND LEGAL ANALYSIS**

RESPONDENTS:     Pakistani Physicians Public Affairs Committee     MUR: 4996  
                         Dr. Parvez Shah, as treasurer

#### **I. GENERATION OF MATTER**

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. *See* 2 U.S.C. § 437g(a)(2).

#### **II. FACTUAL AND LEGAL ANALYSIS**

##### **A. The Law**

The Federal Election Campaign Act of 1971, as amended ("the Act"), requires all political committees to report to the Commission any change in information previously submitted in a Statement of Organization no later than ten days after the change is made. 2 U.S.C. § 433(c).

The Act also requires that all political committees other than authorized committees of a candidate shall file a post-general election report, which shall be filed no later than the 30<sup>th</sup> day after the general election and which shall be complete as of the 20<sup>th</sup> day after such general election. 2 U.S.C. § 434(a)(4)(A)(iii).

## **B. The Facts**

The Pakistani Physicians Public Affairs Committee ("the Committee") is a political committee that is not an authorized committee of a candidate. Dr. Parvez Shah is the treasurer of the Pakistani Physicians Public Affairs Committee.

The Committee registered with the Commission as the Pakistani Physicians Public Affairs Committee. However, the Committee submitted its 1998 Year-End Report on February 2, 1999, using the name *Pakistani American Physicians Public Affairs Committee*. As of this date, the Committee has not filed an amended Statement of Organization to reflect the name change as required by 2 U.S.C. § 433(c).

The Committee failed to file its 1998, 30 Day Post-General Report of Receipts and Disbursements, covering the period from October 15, 1998 through November 23, 1998. The Committee was required to file the 30 Day Post-General Report no later than December 3, 1998.

The Information Division notified the Committee of the filing dates for the 1998, 30 Day Post-General Report with three separate Prior Notices. The Prior Notices were mailed, respectively, to the Committee on December 29, 1997, September 30, 1998, and November 5, 1998. All three Prior Notices informed the Committee that the 30 Day Post-General Report was due on December 3, 1998. Additionally, a Non-Filer Notice was sent to the Committee via mailgram on December 28, 1998.

The Reports Analysis Division ("RAD") attempted to contact Dr. Arif Muslim, then treasurer of the committee. The RAD analyst spoke with the assistant treasurer who stated that Dr. Muslim was out of the country. The assistant treasurer requested a one month extension, and the analyst explained that the Commission does not grant extensions. The assistant treasurer went on to explain that she usually "deals with the problems" and the treasurer then signs the

reports. The analyst recommended she send in the reports unsigned, and that when Dr. Muslim returns, he sign the reports and resubmit them. On February 2, 1999, the Committee submitted its 1998 Year-End Report, which was due on January 31, 1999. The Year-End Report disclosed \$12,800.00 in receipts and \$10,582.79 in disbursements for the period October 15, 1998 through November 23, 1998. Although the Committee eventually disclosed activity on the Year-End Report that should have been reported on a 30 Day Post-General Report, it did so sixty-one (61) days late.

The Committee filed a series of reports late in two previous election cycles. On January 3, 1996, the Committee entered into a conciliation agreement for failure to file five (5) reports timely during the 1993-94 election cycle. On November 14, 1997, the Committee entered into a conciliation agreement for failure to file four (4) reports timely during the 1995-96 election cycle.

Nevertheless, the Committee continues to disregard its reporting responsibilities. The Committee, well aware from the previous matters that filing reports late is a violation of federal law, failed to file its 1998, 30 Day Post-General Report on time.

Therefore, there is reason to believe the Pakistani Physicians Public Affairs Committee knowingly and willfully violated 2 U.S.C. § 434(a)(4)(A)(iii), and Dr. Parvez Shah, as treasurer, violated 2 U.S.C. § 434(a)(4)(A)(iii).